

DONALD H. MEDEARIS, SBN 206849  
BAY AREA LEGAL AID  
1035 Market Street, 6<sup>th</sup> Floor  
San Francisco, CA 94103  
Telephone: (415) 982-1300  
Fax: (415) 982-4243  
dmedearis@baylegal.org

Attorney for Plaintiff,  
ROBERT COLBURN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ROBERT COLBURN,

Plaintiff,

vs.

CAROLYN W. COLVIN, Acting  
Commissioner of the Social Security  
Administration,

Defendant.

) Case No. 3:15-CV-00586-JST

) **STIPULATION AND PROPOSED ORDER**  
) **FOR AN EXTENSION OF TIME FOR**  
) **PLAINTIFF TO FILE MOTION FOR**  
) **SUMMARY JUDGMENT**

IT IS HEREBY STIPULATED, by and between parties, through their representative counsel of record, that Plaintiff shall have a first extension of time of 90 days to file his Motion For Summary Judgement in response to Defendant's Answer . The new date for filing Plaintiff's Motion for Summary Judgement will be September 21, 2015.

This extension is necessary because Donald H. Medearis substituted in as Plaintiff's attorney on June 16, 2015, was not the Plaintiff's attorney in the administrative proceeding, therefore needs more time to familiarize himself with the law and facts of the case to properly prepare the Motion For Summary Judgment, and already has a substantial caseload.

STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:15-CV-00586-JST

1 Plaintiff's Attorney apologizes to the Court and Opposing Counsel for the delay. The parties  
2 further stipulate that the Court's Scheduling Order shall be modified accordingly.

3 Respectfully submitted,

4 Dated: June 17, 2015

/s/Donald H. Medearis  
DONALD H. MEDEARIS  
BAY AREA LEGAL AID

7 Dated: June 17, 2015

MELINDA L. HAAG  
United States Attorney  
DONNA L. CALVERT  
Regional Chief Counsel, Region IX  
Social Security Administration

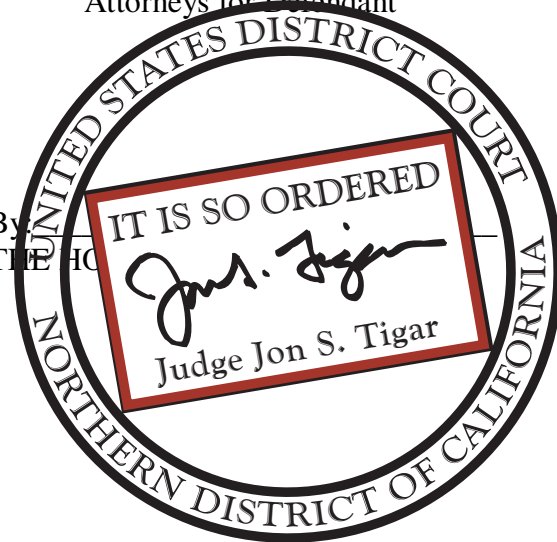
11 By: /s/Richard M. Rodriguez  
12 (\* as authorized by e-mail on June 17, 2015)  
13 RICHARD M. RODRIGUEZ  
14 Special Assistant United States Attorney  
Attorneys for Defendant

15 ORDER:

16 APPROVED AND SO ORDERED

17 Dated: June 19, 2015

18 By: \_\_\_\_\_  
19 THE COURT



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28 STIPULATION TO EXTENSION OF TIME FOR PLAINTIFF TO FILE MOTION FOR  
SUMMARY JUDGMENT, AND PROPOSED ORDER; CASE NO. 3:15-CV-00586-JST